

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

RUSSELL, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:19-cv-00226
)	(Class Action)
HARRIS COUNTY, TEXAS, et al.)	The Honorable Lee H. Rosenthal
)	U.S. District Judge
Defendants.)	
)	

NOTICE OF FILING OF FIRST AMENDED COMPLAINT WITH NEW PARTIES

Plaintiffs hereby provide Notice of Filing of Plaintiffs' First Amended Class Action Complaint, Exhibit 1, as a matter of course under Rule 15(a)(1)(A). Attached to this Notice as Exhibit 2 is a document showing, in redline edits, the changes made to Plaintiffs' originally filed Complaint. These differences are limited to: (1) the addition of two named Plaintiffs and proposed Class Representatives, who meet all of the Rule 23 criteria;¹ and (2) the addition of facts regarding Governor Abbott's Executive Order GA-13. All other allegations have remained unchanged. Rule 15 is an appropriate vehicle for adding named Plaintiffs. *Jackson v. N.A.A.C.P.*, 575 Fed. Appx. 256, 260 (5th Cir. 2014) (citing *Bibbs v. Early*, 541 F.3d 267, 275 n. 39 (5th Cir. 2008)); *Aircraft Holding Solutions, LLC v. Learjet, Inc.*, 2018 WL 6696350, at *1 n.2 (N.D. Tex. Dec. 20, 2018).

Date: May 6, 2020

Respectfully Submitted,

/s/ Alec Karakatsanis

/s/ Neal S. Manne

/s/ Elizabeth Rossi

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¹ On April 13, 2020, Jason Callicotte filed a Motion to intervene. Dkt. 119. Plaintiffs believe the Court should defer ruling on the Motion to Intervene until after Plaintiffs' Motion for Class Certification, Dkt. 11, has been fully briefed and decided because Mr. Callicotte would be a member of the Rule 23(b)(2) transitory class.

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CERTIFICATE OF SERVICE

I certify that on May 6, 2020 a true and correct copy of this document properly was served on counsel of record via electronic filing in accordance with the USDC, Southern District of Texas Procedures for Electronic Filing.

/s/ Elizabeth Rossi

Elizabeth Rossi